Case 1:20-cv-05396-GHW-SDA Document 273 Filed 03/14/23

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MEMORANDUM ENDORSED

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March 14, 2023

By ECF Hon. Gregory H. Woods United States District Judge Southern District of New York 500 Pearl Street, Room 2260 New York, NY 10007

Re: Donohue v. Richard Carranza, et al.

No. 20 Civ. 05396 (GHW) (SDA)

Dear Judge Woods:

We represent defendants Niagara Falls City School District s/h/a Niagara Falls Public School District and Mark Laurrie, in his official capacity as Superintendent (collectively, "Niagara"), in the above-referenced action.

We write to join the NYC DOE's request for a thirty-day extension of time to move for attorneys' fees under 31 U.S.C. § 3730(d)(4) (Dkt. #260). Like the NYC DOE, this extension will afford Niagara additional time to properly evaluate the relevant legal standards and their applicability to the case. It will also promote judicial efficiency by avoiding piecemeal litigation of the attorneys' fees issue.

This is the first request for an extension of time to file this motion. Niagara reached out to Plaintiff-Relator, but received no response concerning this request.

We appreciate the Court's courtesies.

Respectfully submitted,

Jonathan P. Shaub

cc: Counsel of Record Application granted. The deadline for Niagara to file a motion for attorney's fees is extended to April 13, 2023.

The Clerk of Court is respectfully directed to terminate the motion pending at Dkt. No. 269.

SO ORDERED.

Dated: March 14, 2023 New York, New York GREGORY H. WOODS United States District Judge

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